

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

2022 DEC 13 PM 4:03

UNITED STATES OF AMERICA,

OFFICE OF THE CLERK
SEALED

4:22CR3155

vs.

MONICA MOORE,

INDICTMENT
18 U.S.C. §§ 922(a)(6) and 924(a)(2)
18 U.S.C. § 933(a)(1) and (a)(3)

Defendant.

The Grand Jury charges that

COUNT I

From on or about or between June 4, 2022, and October 11, 2022, in the District of Nebraska, defendant MONICA MOORE, in connection with the acquisition of firearms from DE Guns and AAA Pawn; in Lancaster County, Nebraska; licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code; knowingly made a false and fictitious written statement to DE Guns and AAA Pawn; which statement was intended and likely to deceive DE Guns and AAA Pawn as to a fact material to the lawfulness of such acquisition of a firearm to the defendant under chapter 44 of Title 18, in that Defendant MONICA MOORE executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473; and stated that she was the actual buyer of a firearm, when in fact as Defendant MONICA MOORE then knew she was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

SEALED

COUNT II

From on or about or between June 4, 2022, and October 13, 2022, in the District of Nebraska, the defendant, MONICA MOORE, did ship, transport, transfer, cause to be transported, or otherwise dispose of a firearm, to wit:

- 1) a GSG Mauser MP40 .22 caliber rifle,
- 2) a Smith & Wesson M&P 15-22 .22 caliber rifle,
- 3) a FMK 9x19 pistol, and
- 4) a Glock G36 Gen 3 45 caliber pistol;

to Monterell Debose in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by Monterell Debose would constitute a felony, or did attempt or conspire to do so.

In violation of Title 18, United States Code, Sections 933(a)(1) and (a)(3).

A TRUE BILL.

FOREPERSON

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.



DANIEL PACKARD, #21991
Assistant U.S. Attorney